

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

*Defendants.*

Civil Action No. 2:22-cv-00467-JRG-RSP

**JURY DEMANDED**

**UNOPPOSED MOTION TO DISMISS WITHOUT PREJUDICE**

Plaintiff Headwater Research LLC, pursuant to Federal Rule of Civil Procedure 41(a), hereby moves to dismiss all claims between Plaintiff and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. without prejudice, with each party to bear its own costs, expenses and attorneys' fees. Defendants have not yet filed an answer or counterclaims. The parties agree that this dismissal does not count against the two-dismissal under FRCP 41(a)(1)(B).

Date: March 22, 2023

/s/ Robert Christopher Bunt

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**ATTORNEYS FOR PLAINTIFF,  
Headwater Research LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 22 day of March, 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Robert Christopher Bunt  
Robert Christopher Bunt

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), counsel for the Plaintiff met and conferred with counsel for Defendants on February 27, 2023. Defendants are unopposed to the above motion.

/s/ Robert Christopher Bunt  
Robert Christopher Bunt